



NATIONAL PARK SERVICE

Environmental Audit Program

EnviroCheck Sheet

Hazardous Waste Management
June 2002 Update

HAZARDOUS WASTE MANAGEMENT

Because hazardous waste by its nature poses a threat to human health and the environment, Congress passed several statutes aimed at identifying and safely managing hazardous waste, from the moment of its generation until its ultimate disposal (i.e., from “cradle to grave”). These statutes and subsequent amendments have become known by the acronym RCRA (the Resource Conservation and Recovery Act). RCRA has four broad goals:

- To protect human health and the environment from hazards posed by waste disposal;
- To conserve energy and natural resources through waste recycling and recovery;
- To reduce or eliminate the amount of waste generated, including hazardous waste; and
- To ensure that wastes are managed in an environmentally safe manner.

RCRA’s reach is vast, affecting not only the nation’s largest industrial firms, those typically regarded as producers of hazardous waste, but also thousands of small organizations, such as dry cleaners generating small quantities of hazardous solvents. Most NPS facilities generate some form of hazardous waste, such as used paints or solvents.

Auditor’s Guidelines:

Records to Review

- Hazardous Waste Manifests
- Notification of Hazardous Waste Activity form (EPA identification number application)
- Material Data Safety Sheets
- Training records for hazardous waste and HAZWOPER

Features to Observe

- Hazardous waste storage and accumulation areas
- Laboratories
- Hazardous materials storage areas for old or expired chemicals
- Wood Shop
- Maintenance Shop
- Paint Shop

Persons to Contact

- Maintenance supervisors
- Safety officer
- Water and wastewater treatment operators

DEFINITIONS

Solid Waste: Any solid, liquid, semi-solid, or contained gaseous material resulting from industrial, commercial, mining, and agricultural operations, and from community activities. Solid waste may include garbage, or refuse, sludge from a wastewater treatment plant, water supply treatment plant, or air pollution control facility and other discarded material.

Hazardous Waste: Wastes that exhibit certain characteristics may be regulated by RCRA as a hazardous waste. A waste may be considered hazardous if it is ignitable (i.e., burns readily), corrosive, or reactive (e.g., explosive). A waste may also be considered hazardous if it contains certain amounts of toxic chemicals. In addition to these “characteristic” wastes, EPA has also developed a list of over 500 specific hazardous wastes. Hazardous waste takes many physical forms and may be solid, semi-solid, or even liquid.

Waste stream: Specific waste produced by a park (e.g., used antifreeze, batteries or lighting waste).

Generator Status: Indicator of the amount of hazardous waste generated per month. Hazardous waste generators are divided into three categories, based on the amount of waste produced, and are subject to different levels of regulation. The three types of hazardous generators are: (Please note that the following provides only brief generator definitions. For more detailed information, refer to additional information included in this check sheet; also refer to the Internet links listed under each generator type.)

1. **Conditionally exempt small quantity generators (CESQGs):** generate less than 100 kg of hazardous waste, and/or less than or equal to 1 kg of acutely hazardous waste per month (see the CESQG Rule page at www.epa.gov/epaoswer/hazwaste/sqg/cesqg.htm).
2. **Small quantity generators (SQGs):** generate between 100 kg and 1,000 kg of hazardous waste per month. For more information on SQGs (see Understanding the Hazardous Waste Regulations, a Handbook for Small Businesses at www.epa.gov/epaoswer/hazwaste/sqg/sqghand.htm).
3. **Large quantity generators (LQGs):** generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month (see Hazardous Waste Requirements for Large Quantity Generators at www.epa.gov/epaoswer/hazwaste/gener/lqgfact.txt).

Hazardous waste manifest: Hazardous waste shipped by a SQG or a LQG must be with a specific shipping paper called a hazardous waste manifest. The manifest is a multiple-copy tracking document for hazardous waste shipments required by DOT and EPA. The manifest tracks the chain of custody for the waste from the point it leaves the generator to final disposition at a hazardous waste TSDF or a recycling facility.

Satellite Accumulation/Storage: Hazardous waste accumulated and stored at the point of generation and under the control of the person generating the waste. A maximum of 55 gallons of hazardous waste or 1 quart of acutely hazardous waste may be stored at each satellite accumulation area. Satellite accumulation containers must be closed unless waste is being added or removed from the container. Full containers of hazardous waste may be stored at the point of generation for a maximum of 3 days before being transferred to the facility's designated hazardous waste accumulation area.

Treatment, Storage, and Disposal Facility (TSDF): A facility permitted to receive hazardous waste generated by other facilities and to treat, store, or dispose of that waste (note: some parks may be permitted as TSDFs, and if so additional, more stringent regulations will apply to them).

Toxicity Characteristic Leaching Procedure (TCLP): An EPA Test Method designed to identify wastes likely to leach dangerous concentrations of certain known toxic chemicals into groundwater. Using the TCLP on a waste sample creates a liquid leachate that is similar to the liquid EPA would expect to find in the ground near a landfill containing the same waste. Included on the list of 39 different toxic chemicals tested are arsenic, barium, benzene, lead, mercury, and silver. The complete list of contaminants analyzed using the TCLP can be found at 40 CFR 264.21, Table 1.

EPA ID number: Site-specific numbers assigned to generators, transporters, and TSDFs, must be obtained before treating, storing, disposing, or transporting hazardous waste. EPA ID numbers are obtained by filing Form 8700-12, "Notification of Regulated Waste Activity," with the appropriate EPA Regional or authorized state RCRA office. EPA ID numbers are specific to locations shipping waste

LEGAL REQUIREMENTS

Federal

The Resource Conservation and Recovery Act of 1976 (RCRA).

RCRA directed the Environmental Protection Agency (EPA) to establish regulations that would manage the generation, transport, treatment, storage, and disposal of hazardous wastes while simultaneously ensuring the protection of human health and the environment. The statute addresses the potential for contamination from the point of waste generation to the point of final disposal or destruction.

RCRA has been amended several times, most importantly by the Hazardous and Solid Waste Amendments of 1984 (HSWA). Under HSWA, RCRA became focused on waste minimization, and instituted a national land disposal ban program. In order to accomplish these goals, the following objectives were set forth:

- Proper hazardous waste management;
- Waste minimization;
- Reduction in land disposal practices;
- Prohibition of open dumping;
- Encouragement of state authorized RCRA programs;
- Encouragement of research and development; and
- Encouragement of recovery, recycling, and treatment alternatives.

RCRA's "cradle to grave" rules require hazardous waste generators to follow stringent requirements for storage, recordkeeping, pre-transportation, and emergency response and preparedness.

State

Every U.S. state and territory, except Iowa (as of publication of this check sheet), is authorized by EPA to administer their own hazardous waste program. These programs are quite similar to the federal programs; however, state requirements may often be more stringent. Also, as US EPA adopts new RCRA regulations (e.g. the Universal Waste Rule), states must adopt them before they take effect. This Check Sheet addresses only federal RCRA requirements. Additional research into the specific state requirements for each park is important to assure the park is meeting its compliance obligations. A [list of state hazardous waste contacts](http://www.smallbiz-enviroweb.org/html/pdf/HazWaste_500.pdf) is available at http://www.smallbiz-enviroweb.org/html/pdf/HazWaste_500.pdf.

COMPLIANCE REQUIREMENTS

Hazardous waste management can be complex. However, depending upon the amount of waste generated per month, the steps a facility must take to ensure proper management of its hazardous waste can be summarized as follows:

- Properly characterize waste to determine if it is hazardous according to the regulatory definition.
- Count monthly waste generation totals and determine the appropriate hazardous waste generator status.
- Properly manage "satellite" accumulation of waste.
- Properly label hazardous waste containment units (e.g., drums or tanks) with the words "Hazardous Waste," the type of waste in the container, and the day the generator began to accumulate the waste.
- Properly manage hazardous waste containers, and the areas in which they are accumulated prior to disposal.

This document does not necessarily contain all information needed to determine compliance status.

- Transport waste off-site in accordance with proper Department of Transportation (DOT) regulations.
- Manifest waste that is transported off-site and keep copies of those manifests.
- Take necessary precautions to prepare for a spill or other release of a hazardous waste.
- Properly train employees that may generate or handle the hazardous waste.

Following is a more detailed description of the steps listed above.

Characterize Waste

NPS facilities are responsible for properly determining whether each of their waste streams is hazardous or non-hazardous. This process may be called “waste characterization” or “waste determination.” The characterization process enables NPS facilities to determine how their waste must be managed under the RCRA regulations. To properly characterize a waste, the following information must be understood:

Is the material a solid waste?

A material must first be determined to be a “solid waste” (which includes solid, liquid, semisolid, or contained gaseous material) before it can be considered a hazardous waste. The regulatory definition of solid waste (40 CFR 261.2) includes any discarded materials that are abandoned, recycled, inherently waste-like or waste military munitions. (Note, when recycled, some materials are excluded from the definition of solid waste.)

If a material meets the definition of a solid waste, the facility must then determine whether it is hazardous. If a material does not meet the definition of a solid waste, it is not regulated as a RCRA hazardous waste.

Is the waste excluded from hazardous waste regulation?

Determining whether or not a waste is excluded or exempted from hazardous waste regulation is the next step in the RCRA hazardous waste identification process. Only a small fraction of all wastes that meet the RCRA definition of a solid waste are actually considered “hazardous wastes.” The exclusions from the definition of solid waste are listed in 40 CFR 261.4. If a material is listed under that Section of RCRA, it is not a solid waste and therefore cannot be a hazardous waste. The auditor should review the list to see if any of the park’s waste streams fit these exclusions. A few possible examples include domestic sewage and mixtures of domestic sewage, arsenic-treated wood, and household waste.

Is the waste a “listed” hazardous waste?

The final steps in the hazardous waste identification process involve determining whether a waste actually poses a sufficient chemical or physical hazard to merit regulation. Specific hazardous wastes are described or listed on four different lists found at 40 CFR 261, Subpart D. Wastes on these lists are assigned an F, K, U, or P code depending upon their classification as non-specific source, specific source, off-specification material, or residue and spill materials respectively. For example, spent solvent (e.g., acetone or xylene) is an F listed waste (F003).

Note that any time a material is mixed with a listed waste, the **entire** mixture automatically becomes a listed, hazardous waste. For example, although paint is not a listed waste, acetone and xylene are listed. Acetone and xylene used to clean paint from equipment creates a solvent paint waste that is an F listed waste (F003).

Is the waste a “characteristic” hazardous waste?

A hazardous waste *characteristic* is a property that indicates the waste poses a sufficient threat to merit regulation as hazardous (see 40 CFR 261, Subpart C - “Characteristics of Hazardous Wastes”). The four characteristics of hazardous waste are summarized in Table 1.

Table 1: Summary of Characteristic Hazardous Waste

Hazardous Waste Code	Waste Type	Definitions applicable to NPS facilities
D001	Ignitable	Wastes that have a flashpoint below 140F are ignitable. The best source of information to make this determination is the MSDS for the product (if it is an unused product destined for disposal) or analytical testing performed on a representative sample. Many paints and solvents are assigned this hazardous waste code.
D002	Corrosive	Wastes with a pH below 2 or above 12.5 are corrosive. Spilled battery acid and some solvents (such as methylene chloride) are corrosive. The best source of information to make this determination is the MSDS for the product (if it is an unused product destined for disposal) or analytical testing performed on a typical sample of the waste
D003	Reactive	Wastes that are unstable under normal conditions are reactive. Some solvents past their shelf life are reactive since they will explode if shaken or exposed to sunlight.
D004 - D0043	Toxic	Waste that leaches toxic metals or compounds in excess of defined levels in 40 CFR 261 Subpart C is toxic. To make this determination, wastes must undergo the toxic characteristic leaching procedure (TCLP). For instance, if paint chips have a lead concentration greater than 5ppm, they will exceed the lead threshold and be considered a toxic hazardous waste and be assigned a waste code of D006.

To determine if a waste is a characteristic hazardous waste, one or both of the following methods should be used:

- *Apply personal or existing knowledge of the waste stream.* Typically, this involves using information on a Material Safety Data Sheet (MSDS) if it accurately represents the material's characteristics as a waste. An example includes using the MSDS for disposing of an unused paint product. If this method is used, the MSDS(s) used to characterize the waste stream, or any other relevant information used to characterize the waste, must be maintained at the NPS facility and be readily available.
- *Perform analytical testing* of the waste in accordance with the methods outlined in Subpart C of 40 CFR 261. This typically requires that a sample of the waste be sent to a laboratory for analysis at a cost of approximately \$200-1000 per waste stream. Documentation of all waste analyses should be maintained in files at the NPS facility and be readily available.

If analytical testing is used to characterize a waste stream, routine testing of that waste stream is not required thereafter. Waste that is generated as part of a previously characterized waste stream can be assumed to exhibit similar characteristics and does not require continuous testing. However, if the process that generates the waste stream changes, additional or new analyses may be necessary. Similarly, when generator knowledge is the method of waste characterization, a reevaluation of the waste stream is not necessary unless the waste stream changes.

Determine Hazardous Waste Generator Status

A facility's *generator status* is determined by the amount of hazardous waste generated during each calendar month (i.e., **actual** generation, not an **average** over time). Federal regulations define three classifications of hazardous waste generators, which are:

- **Conditionally Exempt Small Quantity Generators.** CESQGs produce 100 kg or less of hazardous waste per calendar month. In addition, generators who produce 1 kg or less of acutely hazardous waste, or 100 kg or less of contaminated soil, waste, or debris resulting from the cleanup of an acute hazardous waste spill, are CESQGs. CESQGs are exempt from Parts 262 through 270 if they comply with the requirements of Section 261.5
- **Small Quantity Generators.** SQGs produce between 100-1,000 kg of hazardous waste per calendar month and are subject to modified regulations found in Part 262. Generally, SQGs must comply with some but not all of the regulations that apply to LQGs. Simplified requirements are specified for SQGs in lieu of some LQG

requirements. (NOTE: There are no limits for the generation of acutely hazardous waste—generators of acutely hazardous waste must fall in either the LQG or CESQG categories.

- **Large Quantity Generators.**¹ LQGs produce 1,000 kg or more of hazardous waste per calendar month, or more than 1 kg of acutely hazardous waste (i.e., waste codes denoted with the hazard code “H” and all P-listed wastes). Wastes from these generators are subject to full regulation under Part 262.

Episodic generation of larger than normal quantities of hazardous waste should be monitored and managed carefully. An NPS facility that exceeds the allowable threshold quantity for a CESQG or SQG in any single month is required to comply with the requirements for the next higher generator classification for *that* month. If, as a result of unforeseen, temporary, or uncontrollable circumstance, (e.g. site remediation or lead paint removal) an SQG accumulates waste for more than 180 days or in amounts in excess of 6000 kg, the facility may request an extension from EPA.

Keep in mind that some states may have only two generator classes: SQG and LQG. In these cases, the CESQG status does not exist and NPS facilities must meet more stringent SQG requirements. Regardless of state requirements, as a BMP, NPS recommends that CESQGs meet storage, disposal, and manifest requirements of an SQG.

Generators must count the quantity of hazardous waste generated each calendar month to determine their generator classification. The regulations stating which hazardous wastes are counted in a generator’s monthly quantity determination are found in 40 CFR 261.5(c) and (d). All generators must comply with those regulations even though the counting requirement is found in the section of the regulations that primarily applies to CESQGs.

A generator must include all hazardous waste that it generates, except hazardous waste that is:

- Managed immediately upon generation in on-site elementary neutralization units, wastewater treatment units, or totally enclosed treatment facilities;
- Recycled, without prior storage or accumulation, in an on-site process subject to regulation under Section 261.6(c)(2);
- Used oil managed under the requirements of Section 261.6(a)(4) and Part 279;
- Spent lead-acid batteries managed under the requirements of Part 266, Subpart G; or
- Universal waste managed under Section 261.9 and Part 273.

To avoid double counting, 40 CFR 261.5(d) states that the following types of waste need not be counted when determining generator classification. All of these wastes should have already been counted when they were initially generated:

- Hazardous waste when removed from on-site storage;
- Hazardous waste produced by on-site treatment (including reclamation) as long as the hazardous waste was counted once; and
- Spent materials generated, reclaimed, and subsequently reused on site, as long as the spent material is counted once during the calendar month.

NPS facilities are expected to maintain records that document the type and quantity of hazardous waste generated each month. Appropriate park staff should periodically review waste generation records to ensure that NPS facilities are maintaining their appropriate hazardous waste generator status.

¹ Parks that are large quantity generators of hazardous waste should contact their regional HazMat coordinator to determine how they may become a small quantity generator.

Properly Manage Hazardous Waste Containers and Container Storage Areas

How an NPS facility must manage its hazardous waste depends upon its generator status. SQGs are allowed to store their hazardous waste in containers or tanks. LQGs are also allowed to store their hazardous waste in containers and tanks as well as drip pads and containment buildings (regulated under subparts W and DD of 40 CFR 265, respectively). CESQGs are exempt from these requirements; however, similar requirements also exist under 29 CFR 1910.106 (OSHA) and should be reviewed for each NPS facility.

Typical requirements for hazardous waste storage unit for NPS facilities that meet the definition of an SQG or LQG are summarized in Table 2.

Table 2: Summary of Hazardous Container and Storage Area Requirements	
40 CFR Section	Regulatory Requirement
262.34(a)(2)	The date upon which hazardous waste accumulation begins must be clearly marked on each container.
262.34(a)(3)	Each container or tank must be labeled clearly with the words “Hazardous Waste.”
265.171	Containers must be in good condition; waste in a leaking container must be transferred to a container in good condition.
265.172	Containers must be compatible with the waste they contain.
265.173 (a)	Containers must be kept closed during storage, except when adding or removing waste.
265.173 (b)	Containers must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.
265.174	NPS staff must inspect the hazardous waste storage areas at least weekly.
265.176	Containers holding ignitable or reactive waste must be located at least 15 meters from the property line.
265.177 (a)	Incompatible wastes and materials should not be placed in the same container.
265.177 (b)	Hazardous waste should not be placed in an unwashed container that previously held an incompatible waste or material.
265.177 (c)	Incompatible wastes should be stored separately or properly protected from one another. For example, acids should be stored separately from organics.
265.177	General requirements listed in 40 CFR 265.17(b) for managing ignitable, reactive, or incompatible wastes must be met.
262.34(c)(1)	Generators can accumulate up to 55 gal. of hazardous waste, or 1 qt. of acutely hazardous waste, at or near the point of generation, as long as it is under the control of the person operating the process that generates the waste. Such “satellite” accumulation is allowed provided that: incompatible wastes are not mixed in the container, the container remains closed except when being filled and it is marked either with the words “Hazardous Waste” or other words that identify the contents. (Satellite accumulation areas should <i>only</i> be used as a temporary storage area for materials that need to be deposited at the NPS facility’s designated hazardous waste storage site.)
262.34(c)(2)	Once a satellite container is filled (the 55 gal. or 1 qt. limit is exceeded), the excess waste must be dated and moved to the designated hazardous waste storage area within 3 days.

Table 2: Summary of Hazardous Container and Storage Area Requirements

40 CFR Section	Regulatory Requirement
261.7(b)	<p>A container that previously stored hazardous waste is considered empty when the following criteria are met:</p> <ul style="list-style-type: none"> • All waste has been removed from the container using normal removal methods; • No more than 2.5 centimeters of residue remain on the container bottom or sides; • For containers less than 110 gallons, no more than 3 percent by weight of the original waste present in the container remains; and • For containers greater than 110 gallons, no more than 0.3 percent by weight of the original waste present in the container remains. <p>Note, additional requirements apply to containers that stored acutely hazardous waste. The NPS facility should consult with a technical expert to address issues involving acutely hazardous wastes.</p>

NPS facilities that meet the definition of a LQG are also subject to the requirements listed in 40 CFR 265.178. These requirements address the control of hazardous waste air emissions from tanks and containers. NPS facilities classified as LQGs should review these requirements carefully if they pump or otherwise transfer hazardous waste in piping or store waste in tanks.

Transport and Disposal of Hazardous Waste

Meet Necessary DOT Requirements for Transport

All hazardous waste generated by an NPS facility must be shipped by a permitted transporter of hazardous waste and sent to a permitted treatment, storage, and disposal facility (TSDF). Exceptions may include materials that are classified as universal wastes, which are subject to less stringent regulatory requirements (see the Universal Waste Check Sheet and the Pesticides Management Check Sheet). NPS facilities disposing of their hazardous waste offsite must ensure that the hazardous waste is properly shipped and the TSDF is operating in accordance with its operating permit.

Containers of hazardous waste shipped offsite must be properly labeled. The labels should identify the waste and its hazard class. NPS staff that label, and make available for transport (e.g., package), hazardous waste, must be trained in Department of Transportation (DOT) Hazardous Material (HAZMAT) procedures (49 CFR). Evidence of training and refresher training (i.e., every three years) should be available at the NPS facility.

Prepare Hazardous Waste Manifest

The “cradle to grave” element of RCRA means that hazardous waste must continue to be tracked after it leaves the generator’s site. All hazardous waste shipments sent for offsite treatment and disposal must be accompanied by a hazardous waste manifest. A federal or state manifest form must be used and contain all requested information, including the NPS facility’s hazardous waste generator identification number, proper DOT shipping name, waste quantity being shipped, shipper’s hazardous waste identification number, and other relevant information. The generator (NPS facility), each transporter, and the owner of the designated TSDF, must each receive a copy of the manifest for their records. All waste manifests generated by the NPS facility must be maintained for a minimum of three years; however, it is recommended that the facility maintain copies indefinitely.

(Note: While not required to do so, it is recommended that CESQGs ship their waste using a manifest and EPA ID number. Many hazardous waste shipping companies refuses to ship a facility’s hazardous waste without a manifest.)

Prepare for a Release of Hazardous Waste

RCRA requires SQGs and LQGs to implement specific procedures to ensure the facility properly prevents releases of hazardous waste or, in the event of a release, has procedures in place to properly respond to that release. In some cases the level of planning depends on the generator status. RCRA requires the following categories of preparation:

- **Contingency Planning and Emergency Procedures.** SQGs are required to implement a basic plan as described in 40 CFR 262.34(d)(5); LQGs are required to implement a full plan as described under 40 CFR 265, Subpart D pursuant to 40 CFR 262.34(a)(4).
- **Preparedness and Prevention Procedures.** Both LQGs and SQGs are required to implement formal methods of preparing for and preventing a release as described under 40 CFR 265, Subpart C, pursuant to 40 CFR 262.34(a)(4) (LQGs) and 40 CFR 262.34(d)(4) (SQGs).

Each of these requirements is discussed in detail in the Emergency Planning and Reporting EnviroCheck Sheet.

Properly Train Employees

NPS facilities must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, commensurate with the employee's position within the park.

LQGs are required to ensure that facility personnel successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures compliance with hazardous waste regulations. Training must be directed by a person trained in hazardous waste management procedures, and must include instruction in hazardous waste management procedures (including contingency plan implementation) relevant to the employee's position.

At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, equipment, and systems, including, **where applicable:**

- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
- Key parameters for automatic waste feed cut-off systems;
- Communications or alarm systems;
- Response to fires or explosions;
- Response to ground-water contamination incidents; and
- Shutdown of operations.

Hazardous waste handlers must be trained within six months of starting their job. Park personnel must take part in an annual review of the initial training.

NPS facilities should document training intended to meet the regulatory requirements (see Recordkeeping section, below).

ADDITIONAL REQUIREMENTS APPLICABLE TO LARGE OR SMALL QUANTITY GENERATORS

Recordkeeping and Reporting Requirements

RCRA requires facilities to prepare and maintain certain records. Some records, suggested as BMP requirements, are not specifically required by regulation, but are necessary to demonstrate compliance with federal/state regulations. For example, regulations specify requirements applicable to conditionally exempt, small and large quantity generators of hazardous waste. However, the regulations do not specify **how** a facility **proves** its generator status. Maintaining a Hazardous Waste Log is a BMP suggestion that serves as a means to prove generator status, but is not specifically required by regulation.

The following sections summarize recordkeeping requirements that are applicable to **all** NPS facilities that generate hazardous waste:

Notification of Regulated Waste Activity

Facilities generating hazardous waste must complete a notification of regulated waste activity (EPA Form 8700-12). This form must be updated and resubmitted whenever facility contact person changes or if the NPS facility's generator status changes. Upon receiving this notification, the State agency that implements the program will issue a permanent EPA identification number to the NPS.

EPA ID numbers are specific to a site. The park would require additional EPA ID numbers for facilities generating hazardous waste that are located and accessed on public roadways that are not adjacent to contiguous NPS property.

Although federal regulations do not require CESQGs to obtain an EPA ID number, it is extremely difficult to find a hazardous waste transporter who will agree to dispose of an NPS facility's waste unless that facility has an EPA ID number. It is NPS policy that all hazardous waste generators, regardless of generator status, obtain an EPA ID number (see Director's Order #30A).

Maintain Waste Characterizations

NPS facilities should maintain files on each waste stream they generate. These files need to be organized by waste stream and include all waste analyses, MSDSs, or other data used to characterize the waste.

Hazardous Waste Log

Generator status is based on the amount of waste generated *monthly*. All NPS facilities should maintain records that can prove their hazardous waste generator status. Such records may include a hazardous waste log or inventory system that tracks the quantity and type of hazardous waste generated monthly. In counting monthly waste totals, the clock starts when waste is first placed in the empty accumulation unit. In counting waste, a generator must include all hazardous waste that it generates, except:

- Hazardous waste exempt from regulation under RCRA;
- Hazardous waste recycled on-site;
- Used oil;
- Certain spent lead-acid batteries; and
- "Universal Waste" (40 CFR 273).

Hazardous Waste Training Records

LQGs and SQGs must provide personnel training to individuals responsible for handling hazardous waste (see reference to training requirements, above). RCRA specifies no recordkeeping requirements for SQG training. However, training records for LQGs should include:

- The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;
- A written job description for each position listed;
- A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed; and
- Records that document that the training or job experience has been given.

Maintain US DOT Training Records

Anyone that prepares, signs, or reviews shipping papers or hazardous waste manifests for transport by a nongovernmental employee, or in a nongovernmental vehicle, must receive training described in 40 CFR 172, Subpart H. The required training records must include the following:

- Employee name;
- Date of most recent training provided;
- Description, copy, or location of training materials used;
- Name and address of person providing training; and
- Certification that the person has been trained and tested in accordance with the requirements of 40 CFR 172, Subpart H.

Exception Reports

When a SQG or LQG sends hazardous waste offsite, they should receive a copy of their manifest with a handwritten signature of the owner/operator of the TSDF that received the waste. If the NPS facility does not receive the signed manifest within 35 days of the date the waste was accepted by the initial transporter, the NPS facility must contact that transporter to determine the status of their hazardous waste. If a generator does not receive a copy of the manifest signed by the designated facility owner or operator within 45 days of the date the waste was accepted by the initial transporter (60 days for a SQG), he or she must file an exception report (§262.42). CESQGs are not required to use a manifest when shipping their waste off site. Exception reports must be maintained for at least three years.

Biennial Reports

A LQG that ships any hazardous waste off-site to a TSDF must prepare and submit a Biennial Report, by March 1 of each even numbered year, that covers hazardous waste generation activities during the previous year. The report must include the following information:

- The EPA identification number, name, and address of the generator;
- The calendar year covered by the report;
- The EPA identification number, name, and address for each off-site TSDF to which waste was shipped during the year;
- The name and EPA identification number of each transporter used during the reporting year;
- A description of each hazardous waste shipped off-site;
- A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated;
- A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984; and
- A certification signed by the generator or authorized representative.

Requirements for completing the report are found at 40 CFR 262.41. Although federal RCRA rules and most states only require that LQGs file biennial reports, some states (e.g., AK, MD) require this of SQGs as well. Copies of Biennial Reports must be maintained onsite for at least 3 years from the due date of the report.

Land Disposal Restriction (LDRs) Notifications

LDRs must be completed for specific hazardous waste streams such as solvent, lead, or benzene-containing waste (e.g., lead-based paint waste from abatement projects). These notifications must be maintained by the NPS facility for a period of at least three years.

Waste Minimization Certification

RCRA requires generators to reduce or eliminate the generation of hazardous waste as expeditiously as possible (RCRA Section 1003(b)). When preparing a manifest, hazardous waste generators are required to certify that they have taken steps to minimize the amount of hazardous waste that they generate. LQGs must certify that they have “a program in place” to reduce the volume and toxicity of the hazardous waste they generate; SQGs must certify that they have made a good faith effort to minimize their waste generation. For more information about waste minimization requirements, see Section IV regarding “Record Keeping and Reporting Requirements,” below.

CESQGs are required to implement pollution prevention programs for hazardous wastes under EO 13148.

Pollution Prevention for Paint and Solvent Hazardous Wastes

Many opportunities are available to reduce, reuse, recycle, substitute, or eliminate paint and solvent usage. The NPS goal in paint management should be to discontinue the use of all solvent-based paints. Good housekeeping practices (e.g., avoiding overspray, donating excess inventory) and waste segregation (e.g., keeping thinner out of waste latex paint) can also greatly reduce the amount of paint waste generated.

Cleaning solvents and degreasers are probably the largest hazardous waste streams found in maintenance shops. The NPS goal in solvent management should be to remove all solvents from their shops or other facilities that could end up as hazardous waste. NPS facilities must evaluate whether it is possible to not clean a part, clean it without using solvents, use an alternative cleaner or process, or use a less hazardous chemical to clean parts that must be cleaned using solvents. Good housekeeping practices and waste segregation can also greatly reduce the amount of solvent waste generated.

The best way to meet pollution prevention goals is through *source reduction*. If source reduction cannot be achieved, recycling should be implemented as the next best alternative to disposal.

Source Reduction

Source reduction means reducing waste at its source, before it is generated. Source reduction strategies include inventory control, source control and product or process changes. *Inventory control* involves purchasing or using only those materials that are needed to avoid generating waste. *Source control* could involve input changes or improved operating practices. For example, source control methods could include reducing emissions in a process or limiting the amount of waste generated by a painting or solvent-using process. *Product changes* could include finding non-toxic, “green” alternatives to toxic paints and solvents. Product changes may also involve other “green” purchasing decisions such as avoiding the purchase of materials that require frequent painting (e.g., wood) in favor of products that do not (plastic). *Process changes* involve changing the process that generates waste such as changing paint application methods to reduce or eliminate waste paint or solvent generation.

Recycling

If source reduction choices are not available, recycling should be used where possible to minimize or avoid the need to treat wastes that remain after viable source reduction options have been evaluated and/or implemented.

Paint recycling can be accomplished by contracting out to an off-site recycler. Recycling paints is possible with both solvent and latex products. Currently there is a limited supply of facilities providing this service. However, waste solvent-based paint can often be shipped to any solvent recovery vendor.

On-site solvent recycling can be performed using a commercially available recovery unit. On-site recycling is most effective when the solvent is used in small quantities and for frequently used materials. On-site recycling is inexpensive, eliminates the need to accumulate significant quantities of spent solvents, and eliminates transportation, costs and risks. However, before performing on-site recycling, NPS facilities must review state environmental regulations for the specific intended use to assure compliance with regulations that control the treatment of hazardous wastes. Depending upon the type of solvent the NPS facility wishes to recycle, and the configuration of the recovery unit, solvent recycling may not be permitted under the hazardous waste regulations applicable to the NPS facility. In addition, although solvent recovery equipment may be acquired easily, someone needs to be trained to operate and maintain it.

It is important that NPS facilities measure the effectiveness of their paint and solvent reduction or elimination strategies so that they can demonstrate an active and successful pollution prevention program. Each facility should track the following parameters on a continuous basis:

- Quantity purchased and used;
- Reduction in applications;
- Quantity and quality recycled;
- Quantity shipped off-site as hazardous waste;
- Quantity released to the air (assume 99%);
- Quantity disposed of; and
- The adequacy of substitutes at meeting facility needs.

ADDITIONAL TOXIC WASTE ISSUES

While not a *hazardous waste* issue, there are additional waste disposal regulations applicable to polychlorinated biphenyls (PCBs) that should also be considered when reviewing a facility's waste disposal practices. In 1977, the Toxic Substances Control Act (TSCA) banned the production, processing, and distribution of PCBs in the United States. The complete regulatory requirements governing the use and disposal of PCBs are found in 40 CFR 761, "Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions."

PCBs have been used for decades in the manufacturing of fluorescent light ballasts, transformers, hydraulic equipment and other products. Due to their non-flammability, chemical stability, high boiling point and electrical insulating properties, PCBs were used in hundreds of industrial and commercial applications. In buildings constructed before 1980, it is probable that electrical components contain PCBs. The most common source of PCBs at NPS facilities is lighting ballasts and transformers.

PCB Ballasts

According to EPA, ballasts manufactured prior to July 1978 have a greater than 50% chance of containing PCBs at 50 parts per million (ppm) in their potting material. Fluorescent light ballasts manufactured **between July 1, 1979, and July 1, 1998** were required to be marked by the manufacturer with the statement "No PCBs." It is acceptable

to treat ballasts with this mark as unregulated for PCBs. (NOTE: It is possible to discover ballasts manufactured after July 1, 1998 that have do not have a “No PCBs” label that are PCB-free.)

If there is no label indicating that there are no PCBs, the EPA suggests two options. First, assume that the material contains PCBs at 50 ppm or greater or second, contact the manufacturer to confirm the ballast is PCB-free. Disposal options for ballasts depend on whether the PCBs are found in an intact and non-leaking PCB small capacitor, a non-intact or leaking PCB small capacitor, or in the potting material. Therefore, it is very important to determine if PCB-containing ballasts are leaking before they are removed from use.

Leaking Ballasts

Leaking PCB-containing ballasts, and all items the leaking material contacts, are considered PCB wastes and are subject to TSCA requirements. PCB contaminated wastes must be incinerated at an EPA-approved, high-temperature incinerator. The TSCA Information Hotline, (202) 554-1404, can answer questions regarding the proper removal, packing, storage, transportation, and disposal of leaking PCB-containing ballasts and other PCB wastes.

Non-Leaking Ballasts

Intact, non-leaking PCB-containing ballasts may be disposed of in municipal solid waste (MSW) landfills. EPA recommends packing and sealing the intact ballasts in 55-gallon drums. However, it is important to note that state and/or local governments may have additional, more stringent requirements for disposing of PCB-containing light ballasts. Additionally, some MSW landfills may refuse to accept non-leaking PCB-containing ballasts, or ballasts that are not labeled “No PCBs.” Generators of PCB-containing ballasts are encouraged to consult with state and local officials, and MSW landfill operators, prior to disposing of known, non-leaking PCB-containing ballasts.

Generally, there are three methods for disposing of non-leaking PCB-containing ballasts that are considered to be more environmentally responsible than disposal in MSW landfills. They are:

- High temperature incineration - this method destroys the PCBs, permanently removing them from the waste stream and limiting future generator liability under CERCLA.
- Recycling - with this method, recyclers remove the PCB-containing ballasts, which are subsequently incinerated or landfilled. Usable materials, such as metals, are then reclaimed for secondary uses.
- Disposal in Chemical or Hazardous Waste Landfill - this disposal method neither eliminates PCBs from the waste stream nor limits potential future generator liability under CERCLA. While this is not the disposal method NPS would prefer, the waste is disposed in a more controlled and monitored environment than municipal solid waste landfills.

PCB Transformers

PCB Transformers with PCBs of >500 ppm, that are in use or in storage for reuse, must not pose an exposure risk to food and feed and are subject to registration requirements. Railroad transformers must not contain dielectric fluid with >1000 ppm PCB and must be serviced according to specific requirements. Combustible materials, including, but not limited to paints, solvents, plastics, paper, and sawn wood, must not be stored by a PCB Transformer.

PCB transformers with PCBs of >500 ppm in use in or near commercial buildings are subject to certain requirements. PCB transformers must be properly serviced, and inspections must be performed once every 3 months for all in-service transformers. If the transformer is found to be leaking, it must be repaired or replaced to eliminate the source of the leak.

When a PCB transformer is involved in a fire, the incident must be reported immediately to the National Response Center (NRC). Mineral oil transformers which are tested and found to be contaminated with >500 ppm PCBs must meet more stringent requirements.

PCB Disposal

PCB liquids containing concentrations >500 ppm must be disposed of in a U.S. EPA-approved PCB incinerator. Transformers containing PCBs in concentrations \geq 500 ppm must be disposed of either in an EPA-approved incinerator or a chemical waste landfill after free liquids are removed and other required procedures are followed.

Storing PCBs

Items containing PCBs at concentrations of >50 ppm, that are stored before disposal, must be stored in a facility that meets structural and operational requirements specified under 40 CFR 761.65 (see U.S. Department of Energy guidance entitled “PCB Storage Requirements,” at <http://tis.eh.doe.gov/oepa/guidance/tasca/pcb-stor.pdf>, for a summary of those requirements). Storage prior to disposal is not to exceed 1 year. Non-leaking and structurally undamaged large high-voltage PCB capacitors and PCB-contaminated electric equipment that have not been drained of free flowing dielectric fluid may be stored on pallets next to a storage area that complies with the storage area requirements if they are checked weekly.

Containers used for the storage of PCBs must comply with the shipping container specification of the Department of Transportation (DOT). Specific requirements must be met for the following: storage of PCB articles for re-use, storage of PCB household waste, storage of PCBs and PCB items in areas not in compliance with the storage area requirements, and storage of bulk PCB remediation waste or PCB bulk product.

Recordkeeping

Facilities that use or store at least 45 kg (99.4 lb) of PCBs in PCB containers, or one or more PCB Transformers, or 50 or more PCB Large High- or Low-Voltage Capacitors must develop and maintain at the facility all annual records and a written annual document log of the disposition of PCBs and PCB items. The written annual document log must be prepared by July 1 of each calendar year, covering the previous year. PCB chemical waste landfills, disposers, commercial storers, incinerators, high efficiency boilers, storage and disposal facilities, importers, and manufacturers are all required to maintain records specific to their operations. Generators are required to maintain manifests and certificates of disposal (COD) for three years.

COMMON VIOLATIONS OF HAZARDOUS WASTE REGULATIONS DISCOVERED AT FEDERAL FACILITIES

Several EPA regions have developed a list of common violations that have been discovered during multi-media compliance audits at federal facilities. These lists do not include all program areas addressed by the NPS Environmental Audit Program. However, since EPA has specifically identified these issues as common compliance violations, they are being identified in the appropriate check sheet. Auditors should keep these issues in mind as they review check sheet audit questions. EPA-identified violations of hazardous waste requirements include:

- An absence of waste determinations.
- Hazardous waste containers left open when not currently in use.
- An absence of hazardous waste labels or mislabeled containers.
- Inadequate aisle space in hazardous waste storage areas.
- No hazardous waste signs or emergency numbers posted at the hazardous waste accumulation area.
- Storage of drums in the hazardous waste accumulation area longer than 90 days.
- Satellite accumulation areas with more than one 55-gallon drum per waste stream.
- Incompatible waste stored next to each other.

- Lack of secondary containment for waste containers.
- Lack of or incomplete weekly inspection logs at hazardous waste storage areas.
- Lack of an appropriate training plan, no annual RCRA training, and/or have poor training records.
- Contractors (e.g., waste haulers) handling waste determinations and manifests (Note: NPS staff signing hazardous waste manifests are legally responsible for both waste determinations and accurate reporting on the manifests, **not** the contractor removing the waste from the site).

FOR MORE INFORMATION

- *Little Known But Allowable Ways to Deal with Hazardous Waste* (EPA 2000) includes federal regulatory information and a list of state hazardous waste contacts, <http://www.epa.gov/sbo/hazwaste_500.pdf>
- EPA RCRA Hotline 800-424-9346 and Hotline Training Modules <<http://www.epa.gov/epaoswer/hotline/modules.htm>>
- EPA Office of Solid Waste, “RCRA Online” <<http://www.epa.gov/rcraonline/>> searchable collection of interpretive memos and letters from EPA.
- EPA Office of Solid Waste, Hazardous Waste page <<http://www.epa.gov/epaoswer/osw/hazwaste.htm>>
- EPA PCB Homepage <<http://www.epa.gov/opptintr/pcb/>>



NATIONAL PARK SERVICE **Environmental Audit Program** **EnviroCheck Sheet**

Hazardous Waste Management
June 2002 Update

CHECKLIST ITEM		PRIORITY	NOTES
1.	State hazardous waste requirements have been reviewed to determine: <ul style="list-style-type: none"> The state's hazardous waste generator status classifications; The state's hazardous waste accumulation time limits; and If waste generated at the park is a listed state hazardous waste. [BMP]	3	
2.	Each waste stream generated at the park has been characterized as hazardous or non-hazardous. [40 CFR 262.11]	2	
3.	Appropriate documentation is maintained on whether park waste streams are hazardous or non-hazardous (whether through process knowledge or testing). [40 CFR 262.40(c)]	2	
4.	Waste characterization documentation for all waste streams are kept for three (3) years after the last time that the waste stream is shipped offsite. [40 CFR 262.40(c)]	2	
5.	Waste characterizations, waste inventories, and other assessments have been conducted to accurately count monthly hazardous waste generation totals to confirm the facility's generator status as a CESQG, SQG or LQG. If the facility cannot verify its status, auditor should make a conservative estimate and audit the facility based on more stringent requirements. [BMP]	3	
6.	If hazardous waste generated at the park, the facility has submitted a Notice of Hazardous Waste Generation Activity and obtained an EPA or State identification number. The Notice is resubmitted to EPA whenever a facility generator status or designated contact person changes. [40 CFR 262.12 (NPS policy for CESQGs, DO #30A)]	2	
7.	If any hazardous waste is disposed of down a drain that mixes the waste with domestic sewage discharged to a wastewater treatment plant, the facility documents approval from the publicly owned treatment work (POTW) or federally owned treatment work (FOTW) that the POTW or FOTW can handle the waste. [BMP]	3	
8.	If any hazardous waste is disposed of down a drain that mixes the waste with domestic sewage discharged to a wastewater treatment plant, the facility documents the waste determinations. [BMP related to 40 CFR 262.11]	3	
9.	If the facility disposes of any hazardous waste down a drain that mixes the waste with domestic sewage discharged to a wastewater treatment plan, the facility documents the quantities generated, and management methods used prior to disposal. [BMP]	2	
10.	Hazardous waste shipped offsite is shipped in accordance with DOT transport requirements. [40 CFR 262.30-33]	2	
CESQGs (<100 kg/month hazardous waste or <1 kg acutely hazardous waste) Only			
11.	No more than 100 kilograms of any hazardous waste is <i>generated</i> in any calendar month including residue or contaminated soil, waste, or other debris resulting from the cleanup of a spill, into or on any land or water, of any acute hazardous wastes. [40 CFR 261.5(a)]	2	

This document does not necessarily contain all information needed to determine compliance status.

CHECKLIST ITEM		PRIORITY	NOTES
12.	No more than 1 kg of acutely hazardous waste is <i>generated</i> in any month. [40 CFR 261.5(e)(1)]	2	
13.	No more than 1000 kilograms of hazardous waste is <i>accumulated</i> at any one time. [40 CFR 261.5 (g)(2)]	2	
14.	To ensure protection of the environment, hazardous waste containers are: <ul style="list-style-type: none"> • In good condition; • Closed, with all bungs closed tight, except when actually adding or removing waste; • Labeled with the words “Hazardous Waste” and contents of the container; • Stacked no more than two containers high on shelves or pallets, and stored with sufficient aisle space to allow for inspection and movement of containers; • Segregated from incompatible waste to prevent mixing in the event of spills; and • Labeled with accumulation start dates. [BMP]	3	
15.	If accumulation limits are exceeded for any month, requirements applicable to SQG are complied with for that month. [40 CFR 261.5 (g)(2)]	2	
16.	If used oil/solvent mixtures are burned in a used oil furnace, records are kept tracking the amount burned. [BMP]	3	
LQGs and SQGs Only			
<i>Note: Where citations include a reference to 40 CFR 265, certain regulations applicable to a hazardous waste Treatment Storage and Disposal Facility (TSDFs) also apply to LQGs or SQGs.</i>			
Container Management (all containers storing hazardous waste)			
17.	Hazardous waste containers are in good condition and are compatible with the material stored in them (e.g., corrosives should be in plastic, not metal containers). [40 CFR 262.34(a) (1)-LQG, (d)(2)-SQG, and 40 CFR 265.172-both]	1	
18.	Hazardous waste containers are closed (with all bungs closed tight) except when adding or removing waste. [40 CFR 262.34(a) (1)-LQG, (d)(2)-SQG, and 40 CFR 265.173 both]	1	
19.	Containers of hazardous waste are clearly labeled with accumulation start dates visible for inspection. [40 CFR 262.34(a)(2)]	2	
20.	Hazardous waste containers are labeled with the words “Hazardous Waste” and the contents of the container. [40 CFR 262.34(a)(3)]	2	
Satellite Accumulation Areas			
21.	Any waste in a satellite accumulation area is under control of the operator of the process generating that waste. [40 CFR 262.34(c)(1)]	2	
22.	Each satellite accumulation area contains 55 gallons or less of any one hazardous waste type at one time. [40 CFR 262.34(c)(1)]	2	
23.	Each container in a satellite accumulation area is marked with the words “Hazardous Waste” or other words that identify the contents of the container. [40 CFR 262.34(c)(1)(i)]	2	
24.	When the amount of hazardous waste stored reaches 55 gallons, containers are labeled with the date the excess waste began accumulating, and are transferred to the 90 or 180-day accumulation area within 3 days. [40 CFR 262.34(c)(2)]	2	

CHECKLIST ITEM		PRIORITY	NOTES
<i>Pre-Transport Requirements</i>			
25.	Before transporting hazardous waste, the waste is packaged, labeled, marked or placarded, as necessary, in accordance with Department of Transportation (DOT) regulations. [40 CFR 262.30-262.33]	2	
26.	Containers are inspected at least weekly for deterioration. [40 CFR 262.34(a) (4)-LQG, (d)(2)-SQG, and 40 CFR 265.174 both]	2	
27.	Incompatible hazardous wastes are segregated with berms, dikes, walls, or other methods to prevent mixing in the event of spills. [40 CFR 262.34(a) (4)-LQG, (d)(2)-SQG, and 40 CFR 265.177(c)-both]	1	
28.	Containers holding ignitable or reactive waste are stored more than 15 meters from a property line. [40 CFR 262.34(a) (4) and 40 CFR 265.176 for LQGs; BMP for SQGs]	1	
29.	Hazardous waste is stored onsite in accordance with the following time limits: <ul style="list-style-type: none"> For SQGs, the hazardous waste is shipped offsite within 180 days of its generation. If the hazardous waste is being shipped greater than 200 miles, the waste is shipped offsite within 270 days of its generation (RCRA). [40 CFR 262.34(d)] For LQGs, the hazardous waste is shipped offsite within 90 days of its generation. [40 CFR 262.34(a)] 	2	
<i>Hazardous Waste Manifests</i>			
30.	A properly completed hazardous waste manifest, which includes the park's EPA ID number, is used for all offsite shipments of hazardous waste. [40 CFR 262.20(a)]	2	
31.	The proper state hazardous waste manifest is used if <i>either</i> the state to which the waste is sent or the state in which the park is located issue their own hazardous waste manifests. [40 CFR 262.21]	2	
32.	A TSDF permitted to handle the park's hazardous waste is identified on the hazardous waste manifest. [40 CFR 262.20(b)]	2	
33.	Park records document that hazardous waste is sent to a well managed, properly permitted TSDF. [BMP]	3	
34.	All hazardous waste that can be recycled is recycled. [BMP related to EO 13148 waste reduction requirement of 50% by 2006]	3	
35.	Copies of hazardous waste manifests, signed by the designated TSDF, are maintained at the park for 3 years. [40 CFR 262.40(a)]	2	
<i>SQGs (100-1000kg/month) Only</i>			
36.	The quantity of hazardous waste generated <i>per calendar month</i> does not exceed 1000 kg. [40 CFR 262.34(d)]		
37.	The quantity of hazardous waste <i>accumulated</i> on-site never exceeds 6000 kg. [40 CFR 262.34(d)(1)]	2	
38.	If a one-time, unusual or unforeseen event occurs at the park (e.g., remediation, or lead paint removal) causing waste to accumulate beyond the <i>accumulation time limits</i> , the facility requested and received the appropriate extension from EPA to maintain its SQG status. Note: There are no exemptions for exceeding <i>quantity</i> limits. [40 CFR 262.34(f)]	2	

CHECKLIST ITEM		PRIORITY	NOTES
39.	If a signed copy of the manifest is not received from the designated TSDF within 60 days of a shipment, a copy of the manifest was submitted, with an explanation that it has not received confirmation, to the EPA Regional Administrator. [40 CFR 262.42(b)]	2	
40.	When hazardous waste is shipped without a manifest, the following apply: <ul style="list-style-type: none"> The waste is sent to a reclaimer under a contractual agreement that specifies the type of waste and frequency of shipments; The vehicle used to transport the waste to the recycling park, and to deliver regenerated material back to the generator, is owned and operated by the waste reclaimer; A copy of the reclamation agreement is maintained in park files for at least three years after termination or expiration of the agreement. [40 CFR 262.20(e)(1) and 262.20(e)(2)]	2	
41.	When burning used oil/solvent mixtures in used oil furnaces, the following specifications are met: <ul style="list-style-type: none"> Volume burned is less than 210 gallons/month; Boiler rating meets EPA minimums; Effective stack height of boiler is greater than 4 m; NPS maintains records of each time waste is burned in the boiler; NPS notifies EPA that it is a small quantity generator and is burning solvent as a method of solvent disposal; Solvent has a minimum heating value of 5,000 Btu/l; Solvent does not contain F020, F021, F022, F023, F026, or F027 waste. [40 CFR 266.108]	2	
<i>Training</i>			
42.	Basic training is provided to park employees to ensure they are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies. [40 CFR 262.34(d)(5)(iii)]	2	
Contingency Planning and Emergency Preparedness and Response			
Emergency response procedures for SQGs are addressed in the Emergency Planning and Reporting Check Sheet.			
LQGs (>1000 kg/month hazardous waste or >1 kg acutely hazardous waste) Only			
43.	A Biennial Report was submitted by March 1 in each even numbered year for the previous year to the EPA Regional Administrator. [40 CFR 262.41]	2	
44.	Park staff actively seeks ways to minimize the toxicity and volume of hazardous waste generated and confirms this on the Biennial Report. [40 CFR 262.41(a)(6)]	2	
45.	If a signed copy of the manifest was not received from the designated TSDF within 45 days of shipment, an Exception Report was completed and sent to EPA Regional Administrator or authorize state agency. 40 CFR 262.42(a)(2)	2	
46.	Copies of each Biennial Report and Exception are kept for a period of at least three years from the due date of the report. [40 CFR 262.40(b)]	2	
<i>Training</i>			
47.	Facility personnel successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures compliance with hazardous waste regulations. [40 CFR 265.16(a)(1)]	1	

CHECKLIST ITEM		PRIORITY	NOTES
48.	Training is directed by a person trained in hazardous waste management procedures, and includes instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. [40 CFR 265.16(a)(2)]	1	
49.	At a minimum, training is designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, equipment, and systems, applicable to park operations. [40 CFR 265.16(a)(3)]	1	
50.	Park personnel receive hazardous waste training within six months of starting their job. [40 CFR 265.16(b)]	1	
51.	Park personnel take part in an annual review of their initial hazardous waste training. 40 CFR 265.16(c)	2	
<i>Recordkeeping</i>			
52.	A list is maintained documenting the employee name and job title for each position related to hazardous waste management. [40 CFR 265.16(d) (1)]	2	
53.	There is a written job description for each job, including the requisite skill, education, or other qualification, and duties of park personnel assigned to each position. [40 CFR 265.16(d) (2)]	2	
54.	There is a written description of the type and amount of both introductory and continuing training that is given to each person listed under Question 52. [40 CFR 265.16(d) (3)]	2	
55.	Personnel records document hazardous waste training or relevant job experience of staff listed under Question 52. [40 CFR 265.16(d)(4)]	2	
56.	Training records are maintained for all current personnel, and on former personnel for at least three years from the date the employee last worked at the park. [40 CFR 265.16(e)]	2	
<i>Contingency Planning and Emergency Preparedness and Response for LQGs</i>			
Emergency response procedures for LQGs are addressed in the Emergency Planning and Reporting Check Sheet.			
<i>PCB Waste</i> <i>Questions 57-70 are not required under the RCRA hazardous waste regulations, but may apply if PCB-containing ballasts or transformers are stored or used at the facility. These questions are not intended to determine full compliance with PCB regulations, but address selected topics regarding PCB waste disposal.</i>			
57.	The facility maintains an inventory of PCB-containing items, with >50 ppm PCBs, such as transformers. [BMP]	3	
58.	PCB waste with >50 ppm PCBs is disposed of within one year of becoming a waste. [40 CFR 761.65(a)(1)]	2	
59.	If the facility stores PCB-containing items at concentrations of 50 ppm or greater, those items are stored in a facility that meet the regulatory requirements of a "PCB storage unit." [40 CFR 761.65(b)] [NOTE: The storage requirements do not apply to small capacitors, such as those found in fluorescent light ballasts.]	2	

CHECKLIST ITEM		PRIORITY	NOTES
60.	A written annual document log is prepared by July 1 of each calendar year, covering the previous year, when at least 45 kg. (99.4 lbs.) of PCBs contained in PCB containers or one or more OCB transformers (500 ppm or greater), or 50 or more large PCB capacitors (high or low voltage), is used or stored at any one time. [40 CFR 761.180(a)]	2	
61.	The facility properly manifests PCB waste sent for disposal. [40 CFR 761.207]	2	
62.	The facility maintains the proper certificate of disposal from the treatment, storage and disposal facility when disposing of PCBs. [40 CFR 761.218]	2	
63.	The facility has not blended or otherwise diluted PCBs regulated for disposal or to avoid disposal requirements. [40 CFR 761.20 (a)(4)]	2	
64.	PCB items are stored in Department of Transportation-approved containers. [40 CFR 761.65 (c)(6)]	2	
<i>PCB Ballasts</i>			
65.	Ballasts which are not specifically labeled “No PCBs” are disposed of as if they contain PCBs, unless it can be documented that they were made after July 1, 1998 (the date after which, labels were no longer required) or confirmation is obtained from the manufacturer indicating they are PCB-free. [40 CFR 761.60(b)(2)(i)]	2	
66.	Leaking PCB ballasts are disposed of at a TSCA-approved incinerator. [40 CFR 761.62(a)]	2	
67.	Intact, non-leaking PCB-containing ballasts are disposed of by: <ul style="list-style-type: none"> • High temperature incineration; • Recycling; or • Disposal in a chemical or hazardous waste landfill. [BMP]	3	
<i>PCB Transformers</i>			
68.	PCB transformers, with concentrations of >500ppm PCBs, have been properly registered with EPA and the local fire department (if applicable). [40 CFR 761.30(a)(1)(vi)]	2	
69.	PCB transformers with >500ppm PCBs are inspected for leaks every 3 months. [40 CFR 761.30(a)(1)(ix)]	2	
<i>SPCC Planning</i>			
70.	If the facility stores (for disposal or reuse) PCB liquids, at concentrations 50 ppm or greater, it has prepared and implemented an SPCC plan, regardless of the volume of oil stored onsite. [40 CFR 761.65(c)(7)(ii), also see SPCC Planning check sheet for plan requirements]	2	